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Looking in the FRN folder I don't have the most recent copy of the Briefing Paper that Larry sent to Lola. So I attached the previous one highlighting the section that discusses the preferred alternative starting on page 3. I've asked Larry to email or place the document in the Z drive where I have access.

I also uploaded chapter 2 so you don't have to go searching for it.

Talk with you all later.

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"Between stimulus and response there is a space. In that space is our power to choose our response. In our response lies our growth and freedom" Viktor E Frankl

DRAFT

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**Chapter I**  
**Introduction**

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# CHAPTER I

## INTRODUCTION

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The US Department of the Interior (DOI), Bureau of Land Management (BLM), Grand Staircase-Escalante National Monument (GSENM), as the lead agency, has prepared this draft Environmental Impact Statement (EIS) and Livestock Grazing Management Plan Amendment (MMP-A). It is a guide for managing BLM lands in GSENM, as well as lands for which GSENM has administrative responsibility for livestock grazing, specifically portions of the BLM's Kanab Field Office (KFO) and Arizona Strip Field Office (ASFO) and National Park Service (NPS)-managed lands in Glen Canyon National Recreation Area (Glen Canyon).

The objectives of this document are as follows:

- To provide direction for managing livestock grazing in GSENM and the land where GSENM administers livestock grazing
- To analyze the social, economic, and environmental effects that could result from implementing the alternatives addressed in the MMP-A

This MMP-A has been prepared using BLM planning regulations and guidance issued under the authority of the Federal Land Policy and Management Act (FLPMA) of 1976 (43 US Code [USC], Section 1701 et seq.) and the BLM's Land Use Planning Handbook, H-1601-I (BLM 2005), as amended. An EIS is incorporated into this document to meet the requirements of the National Environmental Policy Act of 1969 (NEPA), Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations [CFR], Parts 1500-1508), DOI NEPA regulations (43 CFR, Part 46), and the requirements of the BLM's NEPA Handbook, H-1790-I (BLM 2008a).

The land use planning process is the key tool the BLM uses to manage resources and to designate uses on the lands it administers, in coordination with tribal, other federal, state, and local governments, land users, and interested members of the public. To help navigate this document, **Figure I-1, Document Organization**, provides an outline of this MMP-A/EIS and describes the information found within each section.

I  
2

**Figure I-1**  
**Document Organization**

**Executive Summary**

Summarizes the content in the MMP-A/EIS.

**Chapter 1 Introduction**

Presents the proposed action, purpose and need, and decisions to be made in the MMP-A/EIS.

**Chapter 2 Alternatives**

Describes and compares the proposed management alternatives.

**Chapter 3 Affected Environment**

Presents the existing biological, physical, and socioeconomic resources that could be affected by implementing the management alternatives.

**Chapter 4 Environmental Consequences**

Evaluates the impacts of the alternatives on the human and natural environment in terms of environmental, social, and economic consequences projected to occur from implementing the alternatives.

**Chapter 5 Consultation and Coordination**

Describes the scoping and public comment process, agencies contacted, government-to-government consultation. Lists the preparers of the MMP-A/EIS.

**Glossary**

Provides definitions for important terms used in the MMP-A/EIS.

**Index**

Lists where significant issues, resource descriptions, NEPA terms, agencies, and groups discussed in the MMP-A/EIS are located.

**Appendices**

- A Current Management: Grand Staircase-Escalante National Monument
- B Current Management: Glen Canyon National Recreation Area
- C Cultural Resources Management Protocol
- D Forage Analysis Model
- E Section 106 Programmatic Agreement

3  
4

**I.1 BACKGROUND**

Public lands administered by the BLM are managed under land use plans, which require periodic updating. The BLM is required to “develop, maintain, and when appropriate, revise land use plans” (43 USC, Section 1712[a]). The BLM has determined that the existing Monument Management Plan (MMP) needs to be revised and amended to integrate livestock grazing and rangeland management with the management of GSENM resources. In making these livestock grazing decisions, the BLM will consider objects identified in Presidential Proclamation 6920 of September 1996 and the principles of multiple use and sustained yield embodied in the FLPMA and the Taylor Grazing Act.

During the amendment process, the BLM will also consider new information or changed circumstances that were not known when the existing decisions were made. It recognizes that much has changed at the local, regional, and national levels since land use plan decisions for livestock grazing were prepared.

Livestock grazing in the southern Utah and northern Arizona area dates back to the 1860s. The number of cattle, sheep, and horses increased rapidly until the early 1900s and peaked in the early part of the twentieth century. With the passage of the Taylor Grazing Act in 1934, the federal government established regulations pertaining to operators, allotments, kind and number of livestock, and season-of-use for livestock grazing on public land. During the late 1950s and early

## I. Introduction (Background)

In the 1960s, the BLM completed range surveys to determine the capacity of the land for grazing. Because of these surveys, the BLM adjudicated decisions on forage and reduced livestock numbers on most allotments.

A federal court order on April 11, 1975, required the BLM to prepare additional grazing environmental analysis within the next ten years. To comply with this order, the BLM conducted range suitability analyses and field surveys on grazing capacity between 1975 and 1979. In 1980, based on the analysis conducted in the 1970s, the BLM reduced the level of livestock grazing use for resource protection by issuing the Kanab/Escalante Grazing Final Environmental Impact Statement, along with four management framework plans.

Livestock grazing in the planning area is managed according to land use plan decisions set by the Escalante, Paria, Vermilion, and Zion regional management framework plans (MFPs) signed in 1981 (BLM 1981a, 1981b, 1981c, and 1981d) and a subsequent plan amendment of the Escalante MFP completed in 1999 (BLM 1999). The planning area for the 1981 EISs included lands outside of the decision area for this MMP-A/EIS, including portions of the BLM's KFO and ASFO and NPS-managed lands in Glen Canyon.

In September 1996, GSENM was established by Presidential Proclamation 6920. It states, "Nothing in this proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing on Federal lands within the Monument; existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation." The Proclamation directed the completion of an MMP, which was initiated in 1996.

In November 1999, the BLM approved the GSENM MMP and deferred land use-level decisions related to livestock grazing because “Monument designation does not affect existing permits or leases for, or levels of, livestock grazing” (BLM 2000, p. 4). The MMP continues, “...grazing will ultimately be addressed after the completion of assessments for each grazing allotment and the preparation of new allotment management plans.”

The BLM included one specific grazing decision (GRAZ-1) in the MMP that described a process for grazing management and included a schedule for completing the three-step process Monument-wide, as follows:

- An assessment
  - A determination of rangeland health and evaluation of existing grazing management
  - Development of allotment management plans

Steps 1 and 2 were completed in 2006, when the BLM issued rangeland health determinations. Step three of the process indicated that the allotment management plans would designate lands available for livestock grazing; the MMP did not identify lands available for livestock grazing use. Step 3 has not been completed, and GSENM continues to follow the livestock grazing decisions made in the 1981 management framework plans as amended.

In addition to the GRAZ-I decision, more than 20 decisions in the MMP refer to livestock grazing or the allotment evaluation process. However, the MMP does not provide the land use

I. Introduction (Background)

1 plan level decisions needed to integrate livestock and rangeland management with the  
2 management of other GSENM resources. These decisions include identifying the lands available  
3 for livestock grazing, the amount of forage available for livestock, and possible grazing  
4 management practices, such as grazing systems, range improvements (including land treatments),  
5 seasons of use, and stocking rates.

6 Livestock grazing decisions from the management framework plans are outdated. The following  
7 list describes relevant major changes in the planning area since the BLM prepared the last land  
8 use plan decisions for livestock grazing:

- 9 • Establishment of GSENM in 1996
- 10 • Establishment of the Utah BLM Standards for Rangeland Health and Guidelines for  
11 Livestock Grazing Management in 1997
- 12 • Issuance of the Glen Canyon Grazing Management Plan (GzMP) in 1999
- 13 • Acquisition of approximately 175,000 acres of land within the GSENM boundary in  
14 1998
- 15 • Issuance of the MMP in 1999
- 16 • Revision of NPS Management Policies in 2006
- 17 • Issuance of new policy and guidance for the National Landscape Conservation  
18 System in 2012
- 19 • Substantial and continuing increases in visitation to GSENM and the surrounding  
20 BLM- and NPS-managed lands
- 21 • Issuance of state and local plans, such as the Utah Grazing Agricultural  
22 Commodity Zones (updated 2015), Garfield County General Management Plan  
23 (2007), the 1998 Kane County General and Resource Management Plans (as  
24 amended in 2014, 2015, and 2016), and Kane County Land Use Ordinance  
25 (Chapter 27-GSENM Multiple Use/Multiple Functions Grazing Zone; 2014)

26 Land use plan decisions provide the guidelines and criteria related to grazing management  
27 practices and levels of livestock grazing use. Land use plan decisions establish goals and  
28 objectives (i.e., desired outcomes) and the measures to achieve those goals and objectives (i.e.,  
29 management actions and allowable uses). Allowable uses in land use plans identify the uses, or  
30 allocations, that are allowed, restricted, or prohibited on public lands. The BLM grazing  
31 regulations (43 CFR 4130.2[a]) direct grazing permits or leases to be issued to qualified  
32 applicants. The permits authorize use on public lands and other lands under the administration  
33 of the BLM that are designated as available for livestock grazing through land use plans. This  
34 MMP-A designates lands available for livestock grazing.

35 The MMP-A process is limited to and results in land use plan decisions associated with livestock  
36 grazing. Management decisions for lands in the planning area but outside the GSENM boundary will  
37 be consistent with the goals and objectives of the KFO and ASFO Resource Management Plans  
38 (RMPs) and, for Glen Canyon, the NPS Organic Act of 1916 (54 USC, Section 100101). The NPS  
39 will make decisions for the Glen Canyon lands consistent with the NPS Organic Act. The NPS is

I. Introduction (Background)

1 responsible for making decisions related to lands in Glen Canyon. As a cooperating agency with  
2 jurisdiction by law, they have been involved in the process to ensure that the EIS is adequate for a  
3 decision to be made concerning lands in Glen Canyon.

4 **I.2 PURPOSE AND NEED FOR THE PLAN AMENDMENT**

5 This MMP-A is needed to integrate livestock grazing and rangeland management into the existing  
6 MMP. It also provides for the comprehensive, science-based management of livestock grazing  
7 that enables multiple use/sustained yield of renewable resources by maintaining or improving  
8 land health. Land use plan decisions are needed to identify the lands available for livestock  
9 grazing, the amount of forage available for livestock, and possible grazing management practices,  
10 such as grazing systems, range improvements (including land treatments), seasons of use, and  
11 stocking rates (BLM 2005).

12 Updated land use plan decisions for livestock grazing are also needed to incorporate new  
13 information and the many changes that have occurred since the 1980s. Livestock grazing  
14 decisions for GSENM must follow Proclamation 6920, which created the National Monument.

15 The purposes of this MMP-A are as follows:

- 16 • Establish goals and objectives for livestock grazing and rangeland management
- 17 • Establish broad-scale decisions that set the stage for site-specific implementation  
18 decisions, such as timing (season of use), duration (length of time), frequency of  
19 livestock grazing (how often), and magnitude (number of animal unit months  
20 (AUMs)) of livestock grazing
- 21 • Identify where grazing uses are allowed, restricted, or prohibited (i.e., available or  
22 unavailable for livestock grazing)
- 23 • Identify grazing management practices
- 24 • Provide the land use plan level decisions needed to integrate livestock and rangeland  
25 management with the management of GSENM objects and other resources.

26 For the decision area in Glen Canyon, the MMP-A ensures that the BLM's administration of grazing  
27 permits protects the park resources and values of Glen Canyon in accordance with the NPS  
28 Organic Act of 1916 (54 USC, Section 100101). It provides that the BLM accomplish the goals and  
29 objectives defined in the 1979 Glen Canyon National Recreation Area General Management Plan  
30 (GMP), the GzMP, and other applicable land use plans. These goals and objectives are in place to  
31 protect park resources and to avoid unacceptable impacts or impairment.

32 The purposes for Glen Canyon are the same as those for GSENM, with decisions to be made by  
33 the NPS in accordance with applicable laws and policy.

34 **I.3 DESCRIPTION OF THE PLANNING AREA**

35 The planning area encompasses approximately 2,316,100 acres in Garfield and Kane Counties,  
36 Utah, and Coconino County, Arizona. The planning area includes all BLM-managed lands in  
37 GSENM and BLM- and NPS-managed lands for which GSENM has livestock grazing

I. Introduction (Description of the Planning Area)

1 administration responsibility. This includes lands in portions of the BLM's KFO and ASFO and  
 2 NPS-managed lands in Glen Canyon.

3 The planning area is bordered on the west by Bryce Canyon National Park and the BLM KFO,  
 4 on the north by Dixie National Forest, on the east by Capitol Reef National Park and Glen  
 5 Canyon, and on the south by the BLM's KFO and ASFO, Utah State and Institutional Trust  
 6 Lands, and Glen Canyon. Small areas of state, municipal, and private lands are contained within  
 7 the planning area (see **Figure I-2**, Planning Area).

8 The BLM's decision area for this planning effort is all of the BLM grazing lands that GSENM  
 9 administers, including some lands in the BLM's KFO and ASFO; the NPS decision area is lands in  
 10 Glen Canyon where GSENM administers grazing permits. The decision area totals  
 11 approximately 2,242,000 acres in the planning area but does not include state, municipal, or  
 12 private lands, or small areas of BLM-managed land where no grazing decisions have previously  
 13 been made or are being made in the MMP-A. **Table I-1**, Land Status, shows acres by landowner  
 14 or land management agency in the planning area and the decision area.

**Table I-1**  
**Land Status**

Landowner/Management Agency	Acres
<i>Planning Area</i>	
BLM	1,934,800
NPS	318,800
State	19,900
Private	42,600
<b>Total</b>	<b>2,316,100</b>
<i>Decision Area</i>	
BLM, GSENM	1,855,400
BLM, Kanab Field Office	65,500
BLM, Arizona Strip Field Office	2,300
NPS, Glen Canyon	318,800
<b>Total</b>	<b>2,242,000</b>

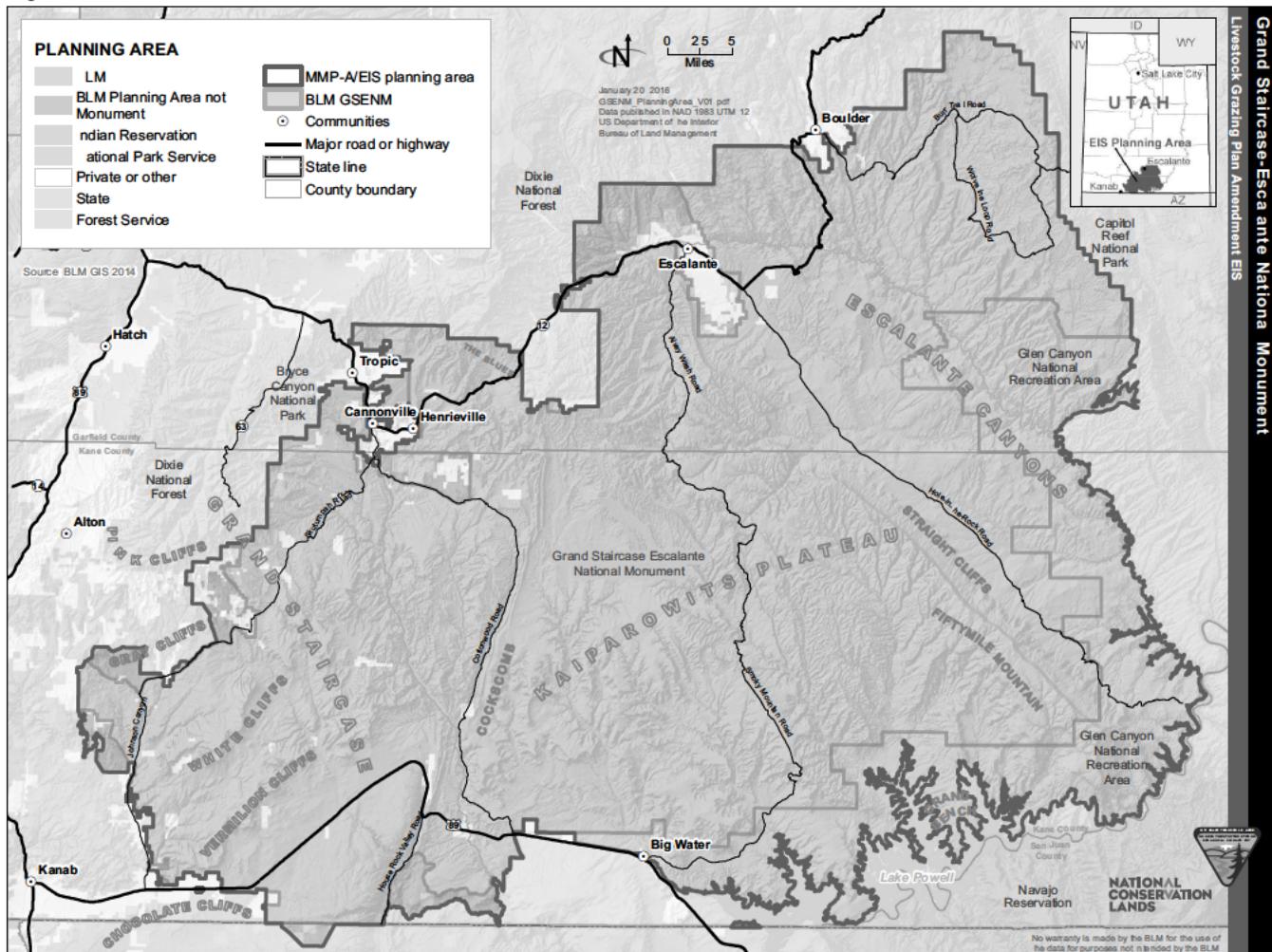
Source: BLM GIS 2014

Note: Acres have been rounded to the nearest 100.

15  
 16 There are 96 allotments in the decision area, 20 of which (approximately 318,800 acres) are  
 17 wholly or partially in Glen Canyon (see **Figure 3-1**, Livestock Grazing Allotments). The BLM  
 18 administers the permits on these allotments, in accordance with the enabling legislation for Glen  
 19 Canyon and by means of a memorandum of understanding and interagency agreement between  
 20 the BLM and the NPS.

21 Twenty allotments (65,500 acres) are wholly or partially in the BLM's KFO; the Sink Holes  
 22 allotment (2,300 acres) is partially in the BLM's ASFO. GSENM has decision-making authority for  
 23 allocation decisions related to these allotments and also administers the permits, in  
 24 conformance with the land use plans for those offices. In other words, the only decisions in this  
 25

Figure 1-2



I. Introduction (Description of the Planning Area)

1 MMP-A that apply to the KFO and ASFO are the allocation decisions related to allotments that  
 2 are available or unavailable for livestock grazing. The BLM Arizona Strip Field Office administers  
 3 the Rock Reservoir and Coyote allotments in GSENM (see **Figure 3-I**, Livestock Grazing  
 4 Allotments).

5 **I.3.1 Livestock Grazing Administration in Glen Canyon**

6 In 1972, Congress passed Glen Canyon's enabling legislation (Public Law 92-593). It created the  
 7 recreation area as a unit of the National Park System, managed by the NPS in accordance with  
 8 the 1916 NPS Organic Act. The purpose of the recreation area, as described in the enabling  
 9 legislation, is "to provide public outdoor recreation use and enjoyment of Lake Powell and lands  
 10 adjacent thereto...and to preserve and protect the scenic, scientific, and historic features  
 11 contributing to public enjoyment of the area."

12 The GzMP specifically identified the following values and purposes: vegetation, soils, wildlife,  
 13 water quality, cultural resources (historic and prehistoric), scenic resources, recreation, and  
 14 paleontology. Grazing, although not a purpose of the recreation area, is a use recognized by  
 15 Congress in Glen Canyon's enabling legislation. It specifies that the BLM should administer  
 16 grazing permits, which it does through four offices. One of these offices is GSENM, which  
 17 includes grazing on a portion of the recreation area.

18 GSENM applies BLM policies for issuing and administering grazing permits, such as the 1934  
 19 Taylor Grazing Act (43 USC, Section 315 et seq.) and, on BLM-administered lands, the FLPMA  
 20 (43 USC, Section 1701 et seq.). In addition, GSENM administration of grazing allotments in Glen  
 21 Canyon is subject to Glen Canyon's enabling legislation. Public Law 92-593 states, "...the  
 22 Secretary shall administer, protect, and develop the recreation area in accordance with the  
 23 provisions of the [Organic] Act of August 25, 1916 (54 USC, Section 100101 et seq.), as  
 24 amended and supplemented, and with other statutory authority available to him for  
 25 conservation and management of natural resources to the extent he finds such authority will  
 26 further the purpose of this Act." The Redwood National Park Expansion Act of March 27, 1978  
 27 (Redwood Amendment), states that in areas of the National Park System, "The authorization of  
 28 activities...shall not be exercised in derogation of the values and purposes for which these  
 29 various areas have been established."

30 On September 4, 1984, to foster coordination between the two agencies, the directors of the  
 31 BLM and the NPS signed an umbrella memorandum of understanding for grazing administration  
 32 in units of the NPS where grazing is authorized. To implement this memorandum of  
 33 understanding, an interagency agreement was executed in 1993 between Glen Canyon and both  
 34 the BLM Utah and Arizona state offices. The interagency agreement was reaffirmed most  
 35 recently in 2015 (Interagency Agreement 1440-3-0001). The intent of this agreement is to  
 36 "conduct a program to coordinate grazing administration activities on [Glen Canyon] which shall  
 37 be carried out by the respective BLM District Managers of the Arizona Strip, Cedar City,  
 38 Richfield, and Moab Districts...and in coordination and cooperation with the Superintendent of  
 39 [Glen Canyon]." This agreement states that the "BLM has expertise in developing, implementing,  
 40 and analyzing grazing programs" and that "NPS has expertise in determining whether an activity  
 41 is consistent with the values and purposes of [Glen Canyon]."

---

I. Introduction (Description of the Planning Area)

1        In accordance with the 1984 umbrella memorandum of understanding, until the Superintendent  
2        of Glen Canyon has determined the potential effects of the proposed action on the values and  
3        purposes of Glen Canyon (i.e., a values and purposes determination), the BLM will not engage in  
4        any of the following:

- 5              • Act on any grazing authorizations, range developments, management plans,  
6              management agreements, or resource monitoring and evaluation  
7              • Approve or act on a change in a grazing permit  
8              • Change the kind of livestock or the season of use  
9              • Implement new construction, reconstruction, or major maintenance of existing  
10          range developments or improvements  
11          • Institute a new or modified allotment management plan, grazing system, or resource  
12          monitoring or evaluation not covered by an agreed-on plan

13        The values and purposes determination processes are to ensure that grazing activities are  
14        consistent with the values and purposes of resources, as called for in the 1916 NPS Organic Act  
15        and the Glen Canyon GMP (NPS 1979). The determinations consider protecting resource values  
16        and their relationship to public use and enjoyment of the area.

17        To give further clarity to the Glen Canyon values and purposes, with respect to grazing  
18        practices across the recreation area, a grazing component (the GzMP) of the GMP was  
19        developed and signed in 1999 (NPS 1999). This plan was to be a foundational document to give  
20        management direction for the future of grazing practices across the recreation area. It was made  
21        to be flexible, allowing new data and methods to be incorporated into the determinations of  
22        park values and resource conditions and the management of livestock practices.

23        The 1999 GzMP identifies specific value statements for each fundamental recreation area  
24        resource in the context of livestock grazing. Resource management goals and 34 resource  
25        objectives were also developed with input from local BLM offices. This was done to comply with  
26        the intent of the NPS Organic Act and Glen Canyon's enabling legislation and to help achieve  
27        each resource value. It is against these 34 objectives that approval of any proposed grazing  
28        activity across the recreation area is based.

29        Grazing in Glen Canyon is managed under the 1999 GzMP (NPS 1999). The BLM will apply the  
30        goals, objectives, and recommendations for grazing practices and management actions identified  
31        in this plan to all alternatives for NPS-managed lands. This will ensure protection of park  
32        resources and values, as defined by the NPS. This plan also provides a means to evaluate and  
33        make appropriate revisions to the GzMP within the Glen Canyon portion of the planning area.

34        **1.4 PLANNING PROCESS**

35        The process for developing, approving, maintaining, and amending the MMP-A is conducted  
36        under the authority of Section 202(f) of FLPMA and Section 202(c) of NEPA. The process is  
37        guided by BLM planning regulations codified in 43 CFR, Part 1600, and CEQ regulations codified  
38        in 40 CFR, Part 1500. It has two levels: land use planning and implementation.

---

I. Introduction (Planning Process)

1 During land use planning, the BLM develops a plan that prescribes the allocation of and general  
2 future management direction for grazing in the decision area. The land use plan then guides the  
3 implementation level, which includes site-specific implementation planning and daily operations.  
4 In this case, the BLM is developing an amendment to the MMP for planning level decisions  
5 related to livestock grazing.

6 Activity or implementation planning is based on the broad-scale grazing land use decisions from  
7 the MMP-A. This is done for site-specific implementation decisions for grazing applicable to  
8 smaller geographic units of BLM-administered land in the decision area. Implementation  
9 decisions identified in the implementation plan require additional planning and NEPA analysis,  
10 based on site-specific conditions. Implementation includes such actions as approving site-specific  
11 range improvements, developing allotment management plans, and issuing grazing permits.  
12 Implementation planning can also identify specific mitigation needs or the need to develop and  
13 implement additional implementation plans and actions in other parts of the decision area.

14 As part of this MMP-A process, published documents will include a draft MMP-A/EIS, a proposed  
15 MMP-A/EIS, and an approved MMP-A/Record of Decision (ROD). Publication of the draft MMP-  
16 A/EIS will initiate a 90-day public comment period; publication of the proposed MMP-A/EIS will  
17 trigger a 30-day public protest period for BLM decisions; there is no protest period for NPS  
18 decisions.

19 **1.5 PUBLIC AND AGENCY COORDINATION**

20 **1.5.1 Agency Coordination**

21 The benefits of enhanced collaboration among agencies in preparing NEPA analyses are the  
22 following:

- 23
- 24 • Disclosing relevant information early in the analytical process
  - 25 • Applying available technical expertise and staff support
  - 26 • Promoting consistency with other federal, state, tribal, and local procedures
  - 27 • Establishing a mechanism for addressing intergovernmental issues

28 Additional information regarding collaboration with governments, agencies, and tribal  
29 representatives is provided in **Chapter 5**, Consultation and Coordination.

30 **1.5.2 Scoping**

31 Scoping, as required by 40 CFR 1501.7, is an early and open process for determining the scope  
32 of issues to be addressed and identifying the significant issues related to a proposed action.  
33 Information collected during scoping may also be used to develop the alternatives to be  
34 addressed in an EIS. The process has two components: internal scoping and external scoping.

35 Internal scoping is conducted within the BLM and cooperating agencies to help determine what  
36 needs to be analyzed in the EIS. It is used to define issues, alternatives, and data needs. It may  
37 also be used for the following purposes (BLM 2008a):

- 38
- To formulate and refine the purpose and need

I. Introduction (Public and Agency Coordination)

- 1      • To identify any connected, cumulative, or similar actions associated with the  
2      proposal
- 3      • To start preparation for cumulative effects analysis
- 4      • To decide the appropriate level of NEPA documentation (i.e., an environmental  
5      assessment or an EIS)
- 6      • To develop a public involvement strategy
- 7      • To decide other features of the NEPA process

8      External scoping involves notification of and opportunities for feedback from other agencies,  
9      organizations, tribes, local governments, and the public. It can be used for the following  
10     purposes:

- 11     • To identify coordination needs with other agencies
- 12     • To refine issues through feedback on preliminary issues
- 13     • To identify new issues and possible alternative
- 14     • To begin identifying past, present, and reasonably foreseeable actions by others that  
15     could have a cumulative effect together with the BLM action

16     The intent of scoping is to focus the analysis on significant issues and reasonable alternatives, to  
17     eliminate extraneous discussion, and to reduce the length of the EIS (BLM 2008a).

18     While CEQ regulations do not provide a standard duration for scoping periods, BLM land use  
19     planning guidance requires a minimum 30-day formal scoping period (BLM 2005). Formal public  
20     scoping begins following the publication of a Notice of Intent in the *Federal Register*. Informal  
21     internal and external scoping may occur before the formal public scoping period begins.

22     According to 43 CFR 1610.2(d), the BLM shall document public participation activities by a  
23     record or summary of the principal issues discussed and comments made. To satisfy this  
24     requirement for scoping, the BLM's NEPA guidance (BLM 2008a) requires the preparation of a  
25     scoping report. In this report are discussions of the issues raised during the scoping process, the  
26     issues to be addressed in the EIS, the issues that will not be addressed in the EIS and why, a list  
27     of participants in the scoping process, and the views of those participants.

28     The BLM published a Notice of Intent to prepare the GSENM Livestock Grazing MMP-A/EIS on  
29     November 4, 2013 (78 Federal Register 66064-66065). This initiated the formal public scoping  
30     period, which ended on January 13, 2014, 30 days after the last public scoping meeting. The  
31     public scoping period lasted 70 days, more than double the minimum required for BLM land use  
32     planning. The BLM published a public scoping report on the project website  
33     (<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=69026>). In addition to the comments documented in the  
34     scoping report, the BLM will consider all comments received during the planning process when  
35     developing the MMP-A.

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## I. Introduction (Public and Agency Coordination)

1        Public scoping activities included the following:

- 2            • The BLM created and is maintaining a project website (<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=69026>) to keep the public informed about the MMP-A/EIS process.
- 3            • In November 2013, the BLM mailed a newsletter, announcing the public scoping period, to more than 350 individuals, agencies, and organizations. It provided project background information, the dates and venues for three scoping meetings, decisions to be made, a planning timeline, preliminary planning criteria and planning issues, and a description of the various methods for submitting comments, including dedicated e-mail and postal mail addresses.
- 4            • The BLM sent a press release announcing the scoping period to local media outlets and posted it on the project website on November 1, 2013. The press release provided the dates and locations of the scoping meetings and described the various methods for submitting comments. The press release was published on KCSG Television's website on November 1, 2013, in the Wayne & Garfield County Insider on December 5, 2013, and in Deseret News on December 6, 2013. Additionally, "The County Seat," a television program, ran a piece explaining the planning and the implications of changes to grazing on ranchers and counties.
- 5            • The BLM hosted three scoping meetings to provide the public with opportunities to become involved, to learn about the project and the planning process, to meet the GSENM MMP-A/EIS team members, and to offer comments. The meetings occurred on December 10, 11, and 12, 2013, in Kanab, Escalante, and Salt Lake City, Utah. The meetings were advertised via press release, the project newsletter, the project website, and phone calls from BLM staff to potentially interested grazing permittees.
- 6            • The NPS and BLM participated in open houses to share information on the GSENM MMP-A and other NPS planning in Page, Arizona, and Blanding, Escalante, Kanab, and Salt Lake City, Utah, in February 2014.
- 7            • The BLM received 564 written submissions during the public scoping period, comprising 205 separate submissions, and 1 form letter. Most written submissions included more than one comment, so the 564 submissions (including form letters) yielded 1,287 discrete comments. Detailed information about the comments received and about the public outreach process can be found in the GSENM Scoping Report, available on the project website (<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=69026>).

8            **Issue Identification**

9        Issue identification is the first step of the nine-step BLM planning process. A planning issue is a  
10 major controversy or dispute regarding management of resources or uses on BLM-administered  
11 lands that can be addressed in a variety of ways, which is within the BLM's authority to resolve.  
12 Planning issues provide the major focus for development of alternatives.

I. Introduction (Public and Agency Coordination)1      **Issues Addressed**

2      The BLM identified preliminary planning issues in the Notice of Intent. Based on public  
 3      comments and further agency coordination, the BLM modified the preliminary planning issues  
 4      and identified additional issues to be addressed in the MMP-A/EIS. Both sets of issues are  
 5      presented in **Table I-2, Planning Issues**.

**Table I-2**  
**Planning Issues**

<b>Preliminary Planning Issues in NOI</b>	<b>Modified and Additional Planning Issues After Public Comments and Agency Coordination</b>
Effects on GSENM Proclamation-identified scientific and historical objects	Effects of livestock grazing management on GSENM Proclamation-identified scientific and historical objects
Lands available for livestock grazing within the planning area	Lands available for livestock grazing in the decision area
Effects on the resources and values for which Glen Canyon was established	Effects of livestock grazing management on the resources and values for which Glen Canyon was established (e.g., public outdoor recreation use and enjoyment and scenic, scientific, and historical features)
Forage currently available on an area-wide basis for livestock grazing and available for future anticipated demands	Forage currently available on an area-wide basis for livestock grazing and available for future anticipated demands
Guidelines and criteria for future allotment-specific adjustments, such as rotational grazing plans, that affect livestock use	Guidelines and criteria for future allotment-specific adjustments, such as the amount of forage available for livestock, season of use, or other grazing management practices
Impacts on local custom and culture and the area's economy	Effects of livestock grazing management on local custom and culture
	Effects of livestock grazing management on the area's economy
Management of existing rangeland improvement seedings	Management of existing range improvement seedings and opportunities for future range improvements
No similar issue	Effects of livestock grazing management on vegetation, including riparian vegetation
No similar issue	Effects of livestock grazing management on soils, including biological soil crusts
No similar issue	Effects of climate change and drought on forage availability
No similar issue	Effects of livestock grazing management on recreation
No similar issue	Effects of livestock grazing on cultural resources

I. Introduction (Public and Agency Coordination)**Issues Considered but Not Further Analyzed**

Approximately 10 percent of the comments received during the public scoping period concerned issues that are not addressed in this MMP-A. These are as follows:

- Implementation decisions that the BLM has already addressed or implementation of the MMP-A, including requests for allotment-specific improvements (such as requests for treatments and structures), suggestions for removing improvements or other items (e.g., fencing, barrels, trash, trash dumps, and stock tanks), requests for additional facilities and signage at recreation areas, and requests that water improvements be retrofitted to meet visual resource management objectives; Other comments concerned feral and trespass cattle, permit renewals, and operator compliance with permits.
- Issues to be addressed through policy or administrative action, including comments pertained to grazing permit costs, potential issues with subleasing permits, allowing fluid minerals development, firing or hiring BLM staff, and making allotment contracts and reporting documents available online.
- Issues that the BLM has addressed but should be better communicated to those who raised the issues, such as reopening a road to the Wahweap Hoodoos, general comments about closing additional routes or restricting OHV use, and making routes available for administrative use by grazing permittees.
- Comments related to laws, regulations, and guidance.
- Issues beyond the scope of the MMP-A, such as comments about land management on areas outside the planning area and comments on issues for which the BLM has limited or no administrative authority, such as hunting, which is regulated by the Utah Division of Wildlife.

Specific comments and issues considered but not further analyzed are provided in the scoping report on the project website (<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=69026>).

**I.5.3 Planning Criteria**

During its initial planning sessions and internal scoping, GSENM staff developed preliminary planning criteria, which establish limitations, guidelines, and standards for the planning process. Planning criteria define the scope of the amendment process and estimate the extent of data collection and analysis. These criteria are based on standards prescribed by applicable laws and regulations, agency guidance, results of consultation and coordination with the public and other federal, state, and local agencies, analysis of information pertinent to the planning area, and professional judgment. The BLM may change planning criteria as a result of public input, as issues are addressed, or as new information is presented.

The BLM identified preliminary planning criteria in the Notice of Intent. Based on public comments and further agency coordination, the BLM modified the preliminary planning criteria for use in preparing the Draft MMP-A/EIS. Both sets of criteria are presented in **Table I-3, Planning Criteria**.

I. Introduction (Public and Agency Coordination)

**Table I-3**  
**Planning Criteria**

<b>Preliminary Planning Criteria in NOI</b>	<b>Modified Planning Criteria After Public Comments and Agency Coordination</b>
The MMP-A will be limited to making land use plan-level decisions specific to livestock grazing.	The BLM will limit the scope of the MMP-A to making land use-level planning decisions specific to livestock grazing.
Lands addressed in the EIS will be those managed by the BLM and the NPS.	This MMP-A will address BLM- and NPS-managed lands, where GSENM administers grazing permits.
Grazing within Glen Canyon will be administered to protect its values and purposes, in accordance with Public Law 92-593 and the 1916 NPS Organic Act.	The BLM and NPS will administer grazing in Glen Canyon to protect its values and purposes, in accordance with Public Law 92-593 and the 1916 NPS Organic Act.
The process must use the Utah BLM Standards for Rangeland Health and Guidelines for Livestock Grazing Management. The BLM will apply existing applicable land health standards to all alternatives.	The BLM will use the Utah BLM Standards for Rangeland Health and Guidelines for Livestock Grazing Management (BLM 1997) and will apply existing land health standards to all alternatives. <sup>1</sup>
The approved MMP-A will comply with the FLPMA, NEPA, the National Historic Preservation Act, CEQ regulations at 40 CFR, Parts 1500-1508, Department of the Interior regulations at 43 CFR, Parts 46 and 1600, the BLM's Land Use Planning Handbook (BLM 2005), its 2008 NEPA Handbook (BLM 2008a), and all other applicable BLM policies and guidance.	The approved MMP-A will comply with the FLPMA, NEPA, National Historic Preservation Act, and CEQ regulations at 40 CFR, Parts 1500-1508.
	The approved MMP-A will comply with 43 CFR, Part 1600, 43 CFR, Part 4100, the BLM Land Use Planning Handbook (BLM 2005), the 2008 BLM NEPA Handbook (BLM 2008a), and other applicable BLM regulations, policies, and guidance.
	Land use planning decisions for Glen Canyon will comply with applicable NPS management policies, director's orders, and reference manuals.
Land use planning decisions must be consistent with the purpose and objectives outlined in the presidential proclamation for GSENM and the enabling legislation for Glen Canyon, as applicable.	Land use planning decisions must be consistent with the Presidential Proclamation for GSENM and with the enabling legislation for Glen Canyon.
	For NPS-managed lands, the BLM will apply to all alternatives the goals, objectives, and recommendations for grazing and management identified in the 1999 GzMP for Glen Canyon; this is to ensure protection of park resources and values, as defined by the NPS. Any proposed updates or revisions to the GzMP goals, objectives, and recommendations for grazing management identified in this MMP-A will be specifically identified and described by alternative.

<sup>1</sup> The Utah BLM Standards of Rangeland Health also apply to the portion of the ASFO where GSENM administers livestock grazing.

I. Introduction (Public and Agency Coordination)

**Table I-3**  
**Planning Criteria**

Preliminary Planning Criteria in NOI	Modified Planning Criteria After Public Comments and Agency Coordination
The socioeconomic analysis will use an accepted input-output quantitative model, such as Impact Analysis for Planning (IMPLAN) or Regional Input Output Modeling System (RIMS II), and Jobs and Economic Development Impact (JEDI) for analysis.	The BLM will use an accepted input-output quantitative model, such as IMPLAN, for socioeconomic analysis.
The BLM and NPS will use current scientific information, research, technologies, and results of inventorying, monitoring, and coordinating to determine appropriate management strategies.	The BLM and NPS will review and use as appropriate current scientific information, research, technologies, and results of inventorying, monitoring, and coordinating to inform management strategies. The use of scientific and scholarly information will be consistent with Department of Interior Manual 305 DM 3.
The BLM and NPS will coordinate and communicate with federal, state, local, and tribal governments to ensure that the BLM and the NPS consider provisions of pertinent plans, seek to resolve inconsistencies between federal, state, local, and tribal plans, and provide ample opportunities for federal, state, local, and tribal governments to comment on the development of the EIS.	The BLM and NPS will coordinate and communicate with federal, state, local, and tribal governments to ensure that the BLM and NPS consider the provisions of pertinent plans and that it seek to resolve inconsistencies between federal, state, local, and tribal plans. The BLM and NPS will also provide ample opportunities for federal, state, local, and tribal governments to comment on amendment development.
The MMP-A will be based on the principles of adaptive management.	The BLM and NPS will base the MMP-A on the principles of adaptive management.

**I.5.4 Legislative Constraints**

The FLPMA is the primary authority for the BLM to manage public lands; it does not apply to NPS-managed lands. This law establishes provisions for land use planning, land acquisition and disposition, administration, rangeland management, rights-of-way, and designated management areas and the repeal of certain laws and statutes. NEPA requires the consideration and public availability of information on the environmental impacts of major federal actions significantly affecting the quality of the human environment.

All management direction and actions developed as part of the BLM planning process are subject to valid existing rights and must meet the objectives of the BLM's multiple-use management mandate and responsibilities (FLPMA Section 202[c] and [e]). Valid existing rights are those in existence within the boundaries of GSENM when it was established on September 18, 1996. These may include rights associated with oil and gas leases, mineral leases, mining claims, and certain lands and realty actions. In addition, as discussed in **Section I.6.1**, grazing uses authorized by the permits or leases in effect on September 18, 1996, and range improvements that were authorized at that time, are to be managed by those laws and regulations that govern grazing on public land. Examples are the FLPMA, the Taylor Grazing Act, and Fundamentals of Rangeland Health regulations (43 CFR, Part 4180). Current BLM policy does not allow it to consider as valid existing rights any Revised Statute 2477 claims that have not been adjudicated.

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I. Introduction (Public and Agency Coordination)

In addition, several other federal laws give direction and authority to the BLM. The following are some of the federal laws that direct the management of public lands and resources in the decision area:

- Antiquities Act of 1906
- Migratory Bird Treaty Act of 1929
- Bald and Golden Eagle Protection Act of 1940, as amended
- National Historic Preservation Act of 1966 (Public Law 89-655; 80 Stat. 915)
- NEPA (Public Law 90-190)
- Clean Air Act of 1970 (42 USC, Section 7401 et seq.)
- Endangered Species Act of 1973, as amended (Public Law 93-205; 87 Stat. 884; 16 USC, Section 1531-1543)
- Public Rangelands Improvement Act of 1978 (43 USC Section 1901-1908)
- American Indian Religious Freedom Act of 1978 (Public Law 95-341; 42 USC, Section 1996)
- Archaeological Resources Protection Act of 1979 (Public Law 96-95; 16 USC, Section 470aa, et seq.)
- Arizona Wilderness Act of 1984 (Public Law 98-406) establishing the Paria Canyon-Vermilion Cliffs Wilderness
- Native American Graves Protection and Repatriation Act of 1990 (Public Law 101-601; 25 USC, Section 3001, et seq.)
- Appendix A of the Committee on Interior and Insular Affairs of the House of Representatives accompanying HR 2570 of the 101st Congress (commonly called the Congressional Wilderness Grazing Guidelines; February 21, 1990)
- Paleontological Resources Protection Act of 2009
- CEQ regulations (40 CFR, Parts 1500-1508)
- FLPMA (Public Law 94-579)
- Omnibus Public Land Management Act of 2009
- Presidential Proclamation 6920 to established GSENM
- BLM Resources management planning regulations (43 CFR, Part 1610)
- NPS Organic Act of 1916 (54 USC, Section 100101)
- Redwood National Park Act of 1968, as amended (Public Law 90-545)
- Legislation establishing Glen Canyon (Public Law 92-593)
- National Park System General Authorities Act, as amended (54 USC, Section 100101)

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I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

I | 1.6 **RELATIONSHIP TO LAWS AND AGENCY REGULATIONS, POLICIES, PLANS, AND  
PROGRAMS**

2 | **I.6.1 BLM**

3 | **GSENM Proclamation and Objects**

4 | GSENM was established by President Bill Clinton on September 18, 1996. President Clinton  
5 | exercised his authority under the Antiquities Act of 1906 and signed a proclamation designating  
6 | objects of historic or scientific interest that he determined to warrant protection. He withdrew  
7 | and reserved the public lands in the National Monument for the care and management of those  
8 | objects. The BLM is obligated under the Antiquities Act of 1906 and the Proclamation to  
9 | manage these public lands to protect the objects.

10 | The President, however, made clear that the BLM has no additional obligation with regard to  
11 | existing grazing uses than it did before the area was designated as a National Monument. In  
12 | particular, the Proclamation specifically addresses grazing use in the following provision:

13 | *Nothing in this proclamation shall be deemed to affect existing permits or leases for, or levels  
14 | of, livestock grazing on Federal lands within the monument; existing grazing uses shall continue  
15 | to be governed by applicable laws and regulations other than this proclamation.*

16 | The “existing permits or leases” and “existing grazing uses” are those in place when the  
17 | President signed the Proclamation. Consequently, grazing uses authorized by the permits or  
18 | leases in effect on September 18, 1996, and range improvements that were authorized at that  
19 | time, are to be managed by those laws and regulations that govern grazing on public land, such  
20 | as the FLPMA, the Taylor Grazing Act, and Fundamentals of Rangeland Health regulations (43  
21 | CFR, Part 4180).

22 | In contrast, the BLM must, under the Antiquities Act and the Proclamation, manage new grazing  
23 | use or range improvements that were not authorized in 1996 to protect monument objects  
24 | within GSENM.

25 | Notwithstanding that the BLM is not obligated under the Antiquities Act to manage the grazing  
26 | use that existed in 1996, it has discretion under the FLPMA, the Taylor Grazing Act, and related  
27 | laws and regulations to manage such grazing use, consistent with the principles of multiple use  
28 | and sustained yield. This would protect resources even if they have been identified as monument  
29 | objects. In other words, the BLM may manage grazing use to minimize the impact on those  
30 | resources in the same way that it may manage grazing use to minimize the impact on resources  
31 | or uses not identified in the Proclamation. Under the FLPMA, the Taylor Grazing Act, and other  
32 | applicable authorities, the BLM may manage grazing use—even the use that existed in 1996—to  
33 | protect resources identified as monument objects even though it has no legal obligation to do  
34 | so.

35 | The MMP-A/EIS Amendment will disclose the effects of grazing on monument objects and other  
36 | resources under a full range of options for grazing management.

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I                   I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

1                   **Livestock Grazing Administration and Planning**

2  
3                   **43 CFR, Part 4100, Grazing Administration**

4                   The BLM administers livestock grazing on lands it manages in the continental United States  
5                   under 43 CFR, Part 4100. Statutory authority for these regulations are the following:

- 6                   • The Taylor Grazing Act, as amended (43 USC 315a through 315r)  
7                   • FLPMA (43 USC, Section 1701 et seq.) as amended by the Public Rangelands  
8                   Improvement Act (43 USC, Section 1901 et seq.)  
9                   • Public Rangelands Improvement Act of 1978 (43 USC Section 1901-1908)  
10                  • Section 4 of the Oregon and California Railroad Lands Act (43 USC 1181d)  
11                  • Executive orders that transfer land acquired under the Bankhead-Jones Farm Tenant  
12                  Act (7 USC 1012) to the Secretary of the Interior and authorize administration  
13                  under the Taylor Grazing Act  
14                  • Public land orders, executive orders, and agreements authorizing the Secretary of  
15                  the Interior to administer livestock grazing on specified lands under the Taylor  
16                  Grazing Act or on other lands as specified

17                  The purpose of 43 CFR, Part 4100, is to provide uniform guidance for administration of grazing  
18                  on public lands, exclusive of Alaska. The objectives of these regulations are as follows:

- 19                  • To promote healthy sustainable rangeland ecosystems  
20                  • To accelerate restoration and improvement of public rangelands to properly  
21                  functioning conditions  
22                  • To promote the orderly use, improvement, and development of the public lands  
23                  • To establish efficient and effective administration of grazing of public rangelands  
24                  • To provide for the sustainability of the western livestock industry and communities  
25                  that depend on productive, healthy public rangelands

26                  These objectives will be consistent with land use plans, multiple use, sustained yield,  
27                  environmental values, economic, and other objectives stated in 43 CFR 1720 and 1725, the  
28                  Taylor Grazing Act of June 28, 1934, as amended (43 USC 315, 315a-315r) and Section 102 of  
29                  FLPMA (43 USC 1740).

30                  In accordance with 43 CFR 4100.0-8, the BLM Authorized Officer "shall manage livestock  
31                  grazing on public lands under the principle of multiple use and sustained yield, and in accordance  
32                  with applicable land use plans. Land use plans shall establish allowable resource uses (either  
33                  singly or in combination), related levels of production or use to be maintained, areas of use, and  
34                  resource condition goals and objectives to be obtained. The plans also set forth program  
35                  constraints and general management practices needed to achieve management objectives."

I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

1       The plans also set forth program constraints and general management practices needed to  
 2       achieve management objectives. Livestock grazing and management approved by the BLM  
 3       Authorized Officer will conform to the land use plan, as defined at 43 CFR 1601.0- 5(b).

4       *BLM Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43*  
 5       *CFR, Part 4180)*

6       The four fundamentals of rangeland health are the basic ecological principles underlying  
 7       sustainable production of rangeland resources. They serve as the basis for the Standards and  
 8       Guidelines for Grazing Management.

9       *Utah BLM Standards for Rangeland Health and Guidelines for Livestock Grazing Management (BLM*  
 10      *1997)*

11      These standards and guidelines were developed in accordance with 43 CFR, Part 4180, to  
 12      provide for conformance with the Fundamentals of Rangeland Health (above). Through  
 13      conformance and attainment of Utah's Standards and Guidelines, the Utah BLM ensures that the  
 14      Fundamentals of Rangeland Health are met. Standards describe the desired condition of the  
 15      biological and physical components and characteristics of rangelands of land health are  
 16      expressions of levels of physical and biological condition or degree of function required for  
 17      healthy lands and sustainable uses, and define minimum resource conditions that must be  
 18      achieved and maintained. Desired conditions may be a higher level than the minimum required  
 19      for ecosystem component function. Guidelines are the grazing management approaches,  
 20      methods, and practices that are intended to achieve a standard.

21      *Manual 4100, Grazing Administration (BLM 2009)*

22      This manual sets forth the objectives, responsibilities, and policies for livestock grazing on BLM-  
 23      managed lands, exclusive of Alaska.

24      *Handbook H-4120-1, Grazing Management (BLM 1987)*

25      This handbook describes cooperative management agreements, allotment management plans,  
 26      range improvements, government agency cooperation, and special rules as they pertain to  
 27      livestock grazing on BLM-managed lands.

28      *BLM Instruction Memorandum 2012-169*

29      This memorandum—Resource Management Plan Alternative Development for Livestock  
 30      Grazing—provides guidance for developing livestock grazing alternatives during land use  
 31      planning. Specifically, the memorandum provides a list describing examples of areas where the  
 32      BLM could consider reducing, increasing, or eliminating livestock grazing within its range of  
 33      alternatives for detailed analysis. Additionally, the memorandum describes instances where an  
 34      alternative that considers no grazing may not be necessary or appropriate for an RMP.

35      **National Landscape Conservation System Policies**

36      *Secretarial Order 3308, Management of the National Landscape Conservation System (November 15,*  
 37      *2010)*

38      This order furthers the purposes of the Omnibus Public Land Management Act of 2009, which  
 39      established the National Landscape Conservation System under the jurisdiction of the BLM. The  
 40      purpose of the National Landscape Conservation System is to conserve, protect, and restore

I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

1 nationally significant landscapes that have outstanding cultural, ecological, and scientific values for  
 2 the benefit of current and future generations. It directs the BLM to manage components of the  
 3 National Landscape Conservation System to protect the values for which they were designated,  
 4 including prohibiting uses that are in conflict with the unit's values. Where consistent with such  
 5 protection and with applicable laws, multiple uses may be allowed.

6 *Manual 6100, National Landscape Conservation System Management (BLM 2012a)*

7 The purpose of this manual is to provide general policy to BLM personnel on managing public  
 8 lands in the National Landscape Conservation System according to the Omnibus Public Land  
 9 Management Act of 2009.

10 *Manual 6220, National Monuments, National Conservation Areas, and Similar Designations (BLM  
 11 2012b)*

12 This manual provides guidance to BLM personnel on managing public lands that are components  
 13 of the National Landscape Conservation System and that have been designated by Congress or  
 14 the President as National Monuments, National Conservation Areas, and similar designations.

15 *Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process  
 16 (BLM 2012c)*

17 This manual contains the BLM's policy and guidance for considering lands with wilderness  
 18 characteristics in its land use planning process under the FLPMA and other applicable law. It  
 19 supersedes all previous guidance on this topic. It does not address or affect policy related to  
 20 congressionally designated Wilderness or existing Wilderness Study Areas (WSAs) pending  
 21 before Congress.

22 *Manual 6330, Management of Wilderness Study Areas (BLM 2012d)*

23 This manual provides BLM personnel with general policies for managing WSAs. It outlines  
 24 procedures to ensure the congressional mandate to manage WSAs "so as not to impair the  
 25 suitability of such areas for preservation as wilderness" will be met.

26 *Manual 6340, Management of Designated Wilderness Areas (BLM 2012e)*

27 This manual provides BLM personnel with general policies for managing BLM Wilderness Areas  
 28 designated by Congress. This manual outlines procedures to ensure the congressional mandate  
 29 to manage each Wilderness Area "to preserve its wilderness character" will be met.

30 *Manual 6400, Wild and Scenic Rivers—Policy and Program Direction for Identification, Evaluation,  
 31 Planning, and Management (BLM 2012f)*

32 This manual provides BLM personnel with policies and program guidance for conducting Wild  
 33 and Scenic River studies in the land use planning process, environmental analysis, and legislative  
 34 reporting. It sets forth requirements for designated rivers and for river segments determined to  
 35 be eligible or suitable for inclusion in the National Wild and Scenic Rivers System. It also  
 36 expands on the DOI - US Department of Agriculture Final Revised Guidelines for Eligibility,  
 37 Classification, and Management of River Areas (47 FR 39454).

38 **Other**

- 39     • Handbook H-1601-1, Land Use Planning Handbook (BLM 2005). The BLM Land Use  
 40         Planning Handbook provides supplemental guidance for implementing the BLM land

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I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

1       use planning requirements established by Sections 201 and 202 of the FLPMA (42  
2       USC 1711-1712) and the regulations at 43 CFR, Part 1600. It provides guidance for  
3       preparing or amending BLM land use plans.

- 4       • Manual 4180, Land Health (BLM 2009). This manual establishes policy, provides  
5       guidelines, and assigns management structure and responsibilities for conducting  
6       land health evaluations.
- 7       • Handbook H-4180-I, Rangeland Health Standards (BLM 2001). This handbook gives  
8       specific direction for implementing the policies listed in the BLM Manual 4180. It  
9       describes the authorities, objectives, and policies that guide the implementation of  
10      the Healthy Rangeland Initiative.
- 11      • Handbook H-4400-I, Rangeland Monitoring and Evaluation (BLM 1989). This  
12      handbook provides guidance related to monitoring and evaluation plans, monitoring  
13      schedules, coordination, training, and sampling.
- 14      • IM 2009-007, Process for Evaluating Status of Land Health and Making  
15      Determinations of Causal Factors When Land Health Standards Are Not Achieved.  
16      This policy establishes requirements for the work that must be completed before  
17      the BLM Authorized Officer signs a determination document that identifies  
18      significant causes for not achieving land health standards. It provides an updated  
19      procedure for evaluating land health, making determinations, and developing  
20      appropriate actions that will make significant progress toward achieving land health  
21      standards developed in accordance with 43 CFR 4180.2(c).
- 22      • IM 2013-094, Resource Management During Drought. Provides general guidance  
23      regarding BLM program management in the face of drought. It also provides specific  
24      livestock grazing program guidance.
- 25      • Assessment, Inventory, and Monitoring (AIM) Strategy (Toevs et al. 2011;  
26      Information Bulletin No. 2012-080). The AIM Strategy establishes a framework for  
27      collecting monitoring data that is consistent and compatible across scales, programs,  
28      and administrative boundaries. Implementation of the AIM Strategy will provide  
29      defensible, quantitative data to inform decisions and allow data to be collected once  
30      and used many times for many purposes.
- 31      • Programmatic agreement for livestock grazing. A Programmatic agreement related  
32      to livestock grazing management, currently under development between GSENM  
33      and Glen Canyon, would allow the agencies to share a breadth of data, including  
34      locational information related to cultural resources—and to areas known to have  
35      concentrations of livestock. Using these data, especially in conjunction with  
36      permittee input, should provide a tool that could help pre-plan the location of range  
37      improvements to avoid or minimize potential adverse effects to historic properties.  
38      This approach should also help direct future monitoring and survey activities and  
39      broader collaboration between GSENM and Glen Canyon.
- 40      • Manual 8100, The Foundations for Managing Cultural Resources (BLM 2004). This  
41      manual is intended as a reference source to provide BLM managers with basic  
42      information and general summary guidance for managing cultural resources.

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I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

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- 1           • Manual 1780, Tribal Relations (BLM 2016a). This manual defines the policies, roles  
2           and responsibilities, and standards for BLM tribal relations and government-to-  
3           government tribal consultation within a comprehensive framework of those legal  
4           authorities affecting this relationship.
- 5           • Handbook H-1780-I, Improving and Sustaining BLM-Tribal Relations (BLM 2016b).  
6           This handbook addresses a broad range of legal authorities and agency programs of  
7           interest to tribes and also highlights BLM responsibilities.

8           **I.6.2 NPS**

9

10          **NPS Organic Act, as Amended**

11          By enacting the Organic Act of 1916, Congress directed the US Department of the Interior and  
12          NPS to manage units of the National Park System “to conserve the scenery and the natural and  
13          historic objects and the wild life therein and to provide for the enjoyment of the same in such  
14          manner and by such means as will leave them unimpaired for the enjoyment of future  
15          generations” (54 USC, Section 100101). Section 3 of the NPS Organic Act permits the Secretary  
16          of the Interior to grant the privilege to graze livestock in all parks except Yellowstone National  
17          Park when such grazing is not “detrimental to the primary purpose” of the affected parks.

18          The 1978 Redwood Amendment (see below) reiterates this mandate by stating that NPS must  
19          conduct its actions to ensure no “derogation of the values and purposes for which these various  
20          areas have been established, except as may have been or shall be directly and specifically  
21          provided by Congress” (54 USC, Section 100101a-21a). Congress intended the language of the  
22          Redwood Amendment to reiterate the provisions of the Organic Act, not to create a  
23          substantively different management standard.

24          The House Committee report described the Redwood Amendment as a “declaration by  
25          Congress” that the promotion and regulation of the national park system is to be consistent  
26          with the Organic Act. The Senate Committee report stated that under the Redwood  
27          Amendment, “The Secretary has an absolute duty, which is not to be compromised, to fulfill the  
28          mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the  
29          units of the national park system.” Although the Organic Act and the Redwood Amendment use  
30          different wording (“unimpaired” and “derogation”) to describe what NPS must avoid, both acts  
31          define a single standard for managing the National Park System, not two different standards. For  
32          simplicity, NPS Management Policies 2006 (NPS 2006) uses “impairment,” not both statutory  
33          phrases, to refer to that single standard.

34          Despite these mandates, the Organic Act and its amendments afford NPS latitude when making  
35          resource decisions to allow appropriate visitor use while preserving resources. By these acts,  
36          Congress “empowered [NPS] with the authority to determine what uses of park resources are  
37          proper and what proportion of the park’s resources are available for each use” (Bicycle Trails  
38          Council of Marin v. Babbitt, 82 F.3d 1445, 1453 [9th Cir. 1996]). In accordance with the NPS  
39          Guidance for Non-Impairment Determinations and NPS NEPA Process (NPS 2011a), a  
40          nonimpairment determination for the selected alternative will be appended to the ROD.

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I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

I      **National Parks Omnibus Management Act of 1998**

2      Both the National Parks Omnibus Management Act of 1998 (16 USC, Section 5901 et seq.) and  
3      NEPA are fundamental to NPS park management decisions. Both acts provide direction for  
4      articulating and connecting the ultimate resource management decision to the analysis of  
5      impacts, using appropriate technical and scientific information. Both also recognize that such  
6      data may not be readily available and provide options for resource impact analysis in this case.

7      **Redwood National Park Expansion Act of 1978, as Amended**

8      Reasserting the system-wide standard of protection established by Congress in the original  
9      Organic Act, the Redwood Amendment stated:

10     *The authorization of activities shall be construed and the protection, management, and  
11    administration of these areas shall be conducted in light of the high public value and  
12    integrity of the National Park System and shall not be exercised in derogation of the  
13    values and purposes for which these various areas have been established, except as  
14    may have been or shall be directly and specifically provided by Congress (Public Law  
15    95-250, 54 USC, Section 100101a-2).*

16     **Glen Canyon Enabling Legislation and Values and Purposes**

17     In 1972, Congress passed Glen Canyon's enabling legislation (Public Law 92-593). The purpose  
18    of the recreation area, as described in the enabling legislation, is "to provide public outdoor  
19    recreation use and enjoyment of Lake Powell and lands adjacent thereto...and to preserve and  
20    protect the scenic, scientific, and historic features contributing to public enjoyment of the area."

21     The values of Glen Canyon are the "scenic, scientific, and historic features" indicated in the  
22    recreation area's enabling legislation of 1972. The GzMP specifically identified the following  
23    values and purposes: vegetation, soils, wildlife, water quality, cultural resources (historic and  
24    prehistoric), scenic resources, recreation, and paleontology.

25     Public Law 92-593 states, "...the Secretary shall administer, protect, and develop the recreation  
26    area in accordance with the provisions of the (Organic) Act of August 25, 1916 (54 USC,  
27    Section 100101 et seq.), as amended and supplemented, and with other statutory authority  
28    available to him for conservation and management of natural resources to the extent he finds  
29    such authority will further the purpose of this Act." The Redwood Amendment states that in  
30    areas of the National Park System, "The authorization of activities...shall not be exercised in  
31    derogation of the values and purposes for which these various areas have been established...."

32     **Livestock Grazing Administration**

33     Livestock grazing administration in Glen Canyon is described in **Section I.3.I**. Additional  
34    direction is provided below.

35     **NPS Management Policies (NPS 2006)**

36     NPS Management Policies 2006 apply to livestock grazing in Glen Canyon. Section 8.6.8.2,  
37    Managing Agricultural Grazing, describes when the National Park Service permits grazing in a  
38    park and which regulations must apply. It specifies, "The National Park Service must manage its  
39    resources in a manner that conserves them for future generations. Parks with agricultural  
40    livestock use, including parks where such use is administered by another agency, must address

I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

1       this use in an appropriate planning document. Agricultural livestock grazing will use best  
 2       management practices to protect park resources, with particular attention being given to  
 3       protecting wetland and riparian areas, sensitive species and their habitats, water quality, and  
 4       cultural resources. Managers must regulate livestock so that (1) ecosystem dynamics and the  
 5       composition, condition, and distribution of native plants and animal communities are not  
 6       significantly altered or otherwise threatened; and (2) cultural values are protected. A  
 7       comprehensive monitoring program must be implemented, and adaptive management practices  
 8       must be used to protect park resources.”

9       Other key sections of the NPS Management Policies for this MMP-A/EIS are Section 1:  
 10      Foundation; Section 2: Park Planning; Section 4: Natural Resources Management; Section 5:  
 11      Cultural Resources Management; Section 6: Wilderness Management; Section 8: Use of the  
 12      Parks; and Section 9: Park Facilities.

13      *Director's Order 53, Special Park Uses*

14      This sets forth the policies and procedures for administering special park uses on NPS-managed  
 15      lands, which includes grazing. Section 10.5 provides guidance for domestic livestock management  
 16      in parks that authorize livestock use when the use is “specifically authorized by a park’s enabling  
 17      act or other law”. However, pursuant to the Glen Canyon Enabling Legislation (Public Law 92-  
 18      593), Glen Canyon does not issue permits for grazing; the BLM administers grazing permits on  
 19      Glen Canyon-managed lands.

20      **NPS Nonimpairment Policy**

21      Section 1.4 of the 2006 NPS Management Policies guidance document discusses nonimpairment  
 22      policies. The NPS must leave park resources and values unimpaired unless directly and  
 23      specifically provided for by legislation or by the proclamation establishing the park. The relevant  
 24      legislation or proclamation must provide explicitly (not by implication or inference) for the  
 25      activity. Impairment is defined as “an impact that, in the professional judgment of the responsible  
 26      NPS manager, would harm the integrity of park resources or values, including the opportunities  
 27      that otherwise would be present for the enjoyment of those resources or values” (NPS 2006).

28      Before approving a proposed action that could lead to an impairment of park resources and  
 29      values, the decision-maker must consider the impacts of the proposed action and determine, in  
 30      writing, that the activity would not impair park resources and values. If there would be an  
 31      impairment, the action must not be approved.

32      **Other**

33      *Glen Canyon Foundation Document*

34      The Glen Canyon Foundation Document provides basic guidance for planning and management  
 35      decisions. The core components of the document include a description of the park, the park’s  
 36      purpose, significance, fundamental resources and values, other important values, and interpretive  
 37      themes. It also includes special mandates and administrative commitments, an assessment of  
 38      planning and data needs that identifies planning issues, planning products to be developed, and  
 39      the associated studies and data required for park planning (NPS 2014).

41      The purpose statement for Glen Canyon is as follows:

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## I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

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1           *Glen Canyon National Recreation Area, located at the center of the Colorado Plateau, provides  
2           for public enjoyment through diverse land- and water-based recreational opportunities, and  
3           protects scenic, scientific, natural, and cultural resources on Lake Powell, the Colorado River, its  
4           tributaries, and surrounding lands.*

5           Significance statements express why a park's resources and values are important enough to  
6           merit designation as a unit of the National Park System. These statements are linked to the  
7           purpose of Glen Canyon and are supported by data, research, and consensus. They describe the  
8           distinctive nature of each park and why an area is important within a global, national, regional,  
9           and system-wide context. They focus on the most important resources and values that will  
10          assist in park planning and management. The following significance statements have been  
11          identified for Glen Canyon:

- 12           • The Colorado River and its many tributaries, including the Dirty Devil, Paria,  
13           Escalante, and San Juan rivers, carve through the Colorado Plateau to form a  
14           landscape of dynamic and complex desert and water environments.
- 15           • The vast, rugged landscapes of Glen Canyon provide an unparalleled spectrum of  
16           diverse land- and water-based recreational opportunities for visitors of wide-ranging  
17           interests and abilities.
- 18           • Glen Canyon preserves a record of more than 10,000 years of human presence,  
19           adaptation, and exploration. This place remains significant for many descendant  
20           communities, providing opportunities for people to connect with cultural values and  
21           associations that are both ancient and contemporary.
- 22           • The deep, 15-mile-long, narrow gorge below the dam provides a glimpse of the high  
23           canyon walls, ancient rock art, and a vestige of the riparian and beach terrace  
24           environments that were seen by John Wesley Powell's Colorado River expedition in  
25           1869, providing a stark contrast to the impounded canyons of Lake Powell.

26           Fundamental resources and values are those features, systems, processes, experiences, stories,  
27           scenes, sounds, smells, or other attributes determined to warrant primary consideration during  
28           planning and management processes. They are important because they are essential to achieving  
29           the purpose of the park and maintaining its significance. Fundamental resources and values are  
30           closely related to a park's legislative purpose and are more specific than significance statements.

31           Fundamental resources and values help focus planning and management efforts on what is truly  
32           significant about the park. One of the most important responsibilities of NPS managers is to  
33           ensure the conservation and public enjoyment of those qualities that are essential (fundamental)  
34           to achieving the purpose of the park and maintaining its significance. If fundamental resources  
35           and values are allowed to deteriorate, the park purpose or significance could be jeopardized.

36           The following fundamental resources and values have been identified for Glen Canyon:

- 37           • **Heritage Resources**—Glen Canyon is the steward of heritage resources  
38           exemplified by the archeological and historic sites, cultural landscapes, and

I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)

1 traditional cultural properties that illustrate the connection of people with the  
 2 landscape of the Glen Canyon region.

- 3 • **Lake Powell**—Lake Powell, set dramatically against a backdrop of eroded red rock  
 4 canyons and mesas, is the largest human-made lake in North America and is widely  
 5 recognized by boating enthusiasts as one of the premier water-based recreation  
 6 destinations in the world.
- 7 • **Landscape**—The vast landscape of Glen Canyon contains rugged water- and wind-  
 8 carved canyons, buttes, mesas, rivers, seeps, springs, and hanging gardens where  
 9 diverse habitats sustain an array of endemic, rare, and relict plant and animal  
 10 communities.
- 11 • **Paleontology**—Glen Canyon preserves one of the most complete sections of  
 12 Mesozoic strata in the world; new discoveries continuously add to our scientific  
 13 understanding of the past.
- 14 • **Water**—Water quality and quantity is essential for public outdoor recreational use  
 15 and enjoyment and for sustaining terrestrial and aquatic life in the high desert.

16 *Director's Order 12, Environmental Impact Analysis*

17 Director's Order 12 (NPS 2011b) and its accompanying handbook (NPS 2015) lay the  
 18 groundwork for how NPS complies with NEPA. Director's Order 12 and the handbook set  
 19 forth a planning process for incorporating scientific and technical information and establishing a  
 20 solid administrative record for NPS projects. Director's Order 12 requires that impacts on park  
 21 resources be analyzed in terms of their context, duration, and intensity. It is crucial for the  
 22 public and decision-makers to understand the implications of those impacts in the short term  
 23 and long term, cumulatively and within context, based on an understanding and interpretation by  
 24 resource professionals and specialists.

25 *Director's Order 28, Cultural Resources Management*

26 This Director's Order offers guidance in applying policies to establish, maintain, and refine park  
 27 cultural resource programs. It refers users to the variety of technical manuals, handbooks, and  
 28 other sources for specific program areas. Chapter 6, Section 5, states that, in accordance with  
 29 NEPA, at the earliest possible stage of planning, it must be determined (1) whether and at what  
 30 level the proposed project area has been surveyed archaeologically, (2) whether archaeological  
 31 resources eligible for listing on the National Register have been identified in the area, and (3)  
 32 whether such resources will be affected by the proposed project.

33 *Director's Order 41, Wilderness Stewardship*

34 This Director's Order offers guidance for wilderness stewardship in eligible, proposed,  
 35 recommended, and designated wilderness areas. Section 6 describes wilderness preservation,  
 36 which includes scientific values, effects of climate change, and cultural resources, which are also  
 37 identified in planning issues for this MMP-A/EIS.

38 *Glen Canyon General Management Plan (NPS 1979)*

39 This plan specifically identified the following values and purposes for the park unit: vegetation,  
 40 soils, wildlife, water quality, cultural resources (historic and prehistoric), scenic resources,

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**I. Introduction (Relationship to Laws and Agency Regulations, Policies, Plans, and Programs)**

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1 recreation, and paleontology. This plan also identified the primary management zones and  
 2 objectives for Glen Canyon and established the park road system.

3 *Resources Management Plan, Cultural Component, Glen Canyon National Recreation Area (NPS 1987)*  
 4 The Cultural Resources Management Plan provides detailed information on how NPS personnel  
 5 will carry out the programmatic responsibilities outlined in Director's Order 28. These  
 6 responsibilities include research to identify, evaluate, and interpret the cultural resources at the  
 7 recreation area. The Cultural Resources Management Plan also provides a means to integrate  
 8 cultural resources management issues into recreation area planning.

9 **1.7 RELATED PLANS**

10 The FLPMA requires that the MMP-A, "...be consistent with State and local plans to the  
 11 maximum extent... consistent with Federal law and the purposes of [the FLPMA]" (43 USC  
 12 1712[c][9]). The MMP-A also should be consistent with the purposes, policies, and programs of  
 13 federal laws and regulations applicable to BLM-administered lands. Plans formulated by federal,  
 14 state, local, and tribal governments that relate to land and resource management have been  
 15 reviewed and considered as the MMP-A/EIS has been developed. An evaluation of consistency  
 16 with these related plans has begun, and results are presented in **Section 5.4**.

17 **1.7.1 Other Federal Plans**

- 18 • Kanab Field Office Resource Management Plan (BLM 2008b)—This RMP provides  
   19 management direction for the KFO. The BLM GSENM retains livestock grazing  
   20 administration responsibility for certain allotments that are in both the Kanab Field  
   21 Office and GSENM. The KFO is responsible for all other aspects of land  
   22 management, as directed by the KFO RMP.
- 23 • Arizona Strip Field Office Record of Decision and Resource Management Plan (BLM  
   24 2008c)—This RMP provides management direction for the ASFO. The BLM GSENM  
   25 retains livestock grazing administration responsibility for certain allotments that are  
   26 in both the ASFO and GSENM. The ASFO is responsible for all other aspects of land  
   27 management, as directed by the ASFO RMP.
- 28 • Paria Canyon-Vermilion Cliffs Wilderness Management Plan (BLM 1984)—This  
   29 management plan provides management direction for the Paria Canyon-Vermilion  
   30 Cliffs Wilderness, which includes decisions for livestock grazing management.
- 31 • Dixie National Forest Land and Resource Management Plan (Forest Service 1986),  
   32 as amended—Certain allotments in the decision area extend onto the Dixie  
   33 National Forest. While the Forest Service is responsible for all management  
   34 decisions pertaining to the portion of the allotments on the National Forest, the  
   35 BLM is responsible for permit administration on the portions in the planning area.  
   36 The BLM coordinates with the Dixie National Forest to maintain a cohesive grazing  
   37 system on the common allotments.

38 **1.7.2 State Statutes and Plans**

- 39 • Utah Code, Title 63J Chapter 4, Part 4, Planning—This part describes the duties of  
   40 the planning coordinator and office.

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I. Introduction (Related Plans)

- 1           • Utah Code, Title 63J, Chapter 8, State of Utah Resource Management Plan for  
2           Federal Lands—Within this chapter, Section 105.8 established the Utah Grazing  
3           Agricultural Commodity Zones. The Escalante Region Grazing Zone is one of many  
4           grazing zones across Utah. The purpose of these grazing zones are as follows:  
5               – Preserving and protecting the agricultural livestock industry from ongoing  
6               threats  
7               – Preserving and protecting the history, culture, customs, and economic value  
8               of the agricultural livestock industry from ongoing threats  
9               – Maximizing efficient and responsible restoration, reclamation, preservation,  
10              enhancement, and development of forage and watering resources for  
11              grazing and wildlife practices and affected natural, historical, and cultural  
12              activities

13           **I.7.3 Local Government Plans**

- 14           • Coconino County Comprehensive Plan—This plan was adopted in 2003 but is being  
15           revised. The plan addresses growth, conservation, and development and includes a  
16           section on preserving ranches and ranchlands in the county.
- 17           • Garfield County General Management Plan (adopted November 8, 2007)—This plan  
18           establishes criteria, policies, and requirements to be met in the federal land use  
19           planning process. It documents baseline conditions for analysis and states that,  
20           where quantified data is not available, professional judgment must defer to policies  
21           and objectives outlined in the Garfield County Resource Management Plan. A 2013  
22           amendment addresses the cultural and historic value of grazing and places the  
23           Escalante Historic/Cultural Grazing Region on the County Register of Cultural and  
24           Historic Resources.
- 25           • Kane County General Plan (adopted June 22, 1998; last amended November 9,  
26           2016)—This plan addresses growth and development and partnerships with federal  
27           agencies in Kane County. It was amended in August 2014 to adopt the Escalante  
28           Region Multiple Use/Multiple Functions Grazing Zone in response to public  
29           concerns on grazing of public lands versus private lands and agricultural pursuits.  
30           The grazing zone emphasizes the social, economic, historic, and cultural importance  
31           of grazing to Kane County and its residents.
- 32           • Kane County Land Use Ordinance, Chapter 27, Escalante Region Multiple  
33           Use/Multiple Functions Grazing Zone (last amended September 22, 2014)—Chapter  
34           27 of the Kane County Land Use Ordinance establishes the Escalante Region  
35           Multiple Use/Multiple Functions Grazing Zone, which overlaps GSENM. The  
36           ordinance states that the purpose of providing a multiple use/multiple functions  
37           zone are to establish areas that are open and generally undeveloped lands where  
38           human habitation would be limited. The zone is designed to enhance and protect  
39           land and associated open space resources. It is established to encourage the use of  
40           land, where appropriate, for livestock grazing, wildlife habitat, and recreation, among  
41           other uses. This zone is established to protect all valid private property rights and  
42           the continued use and full access to these rights. This zone is intended to promote

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I. Introduction (Related Plans)

I           the health, safety, convenience, order, prosperity, and general welfare and economy  
2           of the inhabitants of Kane County, tourists, and future generations.

- 3           • Kane County Resource Management Plan (adopted June 22, 1998; last amended  
4           November 9, 2016)—This document establishes the county's resource development  
5           goals, objectives, and policies, in coordination with the county Land Use Authority.  
6           It addresses the county's current and future desired conditions for land use and  
7           development, grazing, and natural resource management.

8           **1.8 REFERENCES**

9           BLM (US Department of the Interior, Bureau of Land Management). 1981a. Escalante Management  
10          Framework Plan. BLM, Escalante Resource Area, Cedar City District. April 22, 1981.

11          \_\_\_\_\_. 1981b. Paria Management Framework Plan. BLM, Kanab Resource Area, Cedar City District.  
12          April 22, 1981.

13          \_\_\_\_\_. 1981c. Vermilion Management Framework Plan. BLM, Kanab Resource Area, Cedar City  
14          District. April 22, 1981.

15          \_\_\_\_\_. 1981d. Zion Management Framework Plan. BLM, Kanab Resource Area, Cedar City District.  
16          April 22, 1981.

17          \_\_\_\_\_. 1984. Paria Canyon-Vermilion Cliffs Wilderness Management Plan. Coconino County, Arizona,  
18          and Kane County, Utah.

19          \_\_\_\_\_. 1989. Handbook H-4400-I, Rangeland Monitoring and Evaluation. Rel. 4-98. November 11,  
20          1989.

21          \_\_\_\_\_. 1997. Utah BLM Standards for Rangeland Health and Guidelines for Livestock Grazing  
22          Management. Internet website: [http://www.blm.gov/ut/st/en/fo/vernal/grazing/\\_rangeland\\_health\\_standards.html](http://www.blm.gov/ut/st/en/fo/vernal/grazing/_rangeland_health_standards.html).

24          \_\_\_\_\_. 1999. Escalante Management Framework Plan Approved Amendment and Record of Decision.  
25          BLM Utah State Office, Salt Lake City. March 15, 1999.

26          \_\_\_\_\_. 2000. Grand Staircase-Escalante National Monument Management Plan and Record of Decision.  
27          BLM, Grand Staircase-Escalante National Monument, Cedar City, Utah. February 2000.

28          \_\_\_\_\_. 2001. Handbook H-4180-I, Rangeland Health Standards. BLM, Washington, DC. January 19,  
29          2001.

30          \_\_\_\_\_. 2004. Manual 8100, The Foundations for Managing Cultural Resources. BLM, Washington, DC.  
31          December 3, 2004.

32          \_\_\_\_\_. 2005. Handbook H-1601-I, Land Use Planning Handbook. BLM, Washington, DC. March 11,  
33          2005.

## I. Introduction (References)

- I        . 2008a. Handbook H-1790-I: NEPA Handbook. Rel. I-1710, January 30, 2008. BLM, Washington, DC.

2

3        . 2008b. Kanab Field Office Record of Decision and Approved Resource Management Plan. BLM, Kanab Field Office, Kanab, Utah. October 2008.

4

5        . 2008c. Arizona Strip Field Office Record of Decision and Resource Management Plan. BLM, Arizona Strip Field Office, St. George, Utah. February 2008.

6

7        . 2009. Manual 4180, Land Health. BLM, Washington, DC. Rel. 4-110. January 16, 2009.

8

9        . 2012a. Manual 6100, National Landscape Conservation System Management. Rel. 6-131. BLM, Washington, DC. July 13, 2012. Internet website: [http://www.blm.gov/style/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.64370.File.dat/6100.pdf](http://www.blm.gov/style/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.64370.File.dat/6100.pdf).

10

11       . 2012b. Manual 6220, National Monuments, National Conservation Areas, and Similar Designations. BLM, Washington, DC.

12

13       . 2012c. Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process. BLM, Washington, DC.

14

15       . 2012d. Manual 6330, Management of Wilderness Study Areas. BLM, Washington, DC.

16

17       . 2012e. Manual 6340, Management of Designated Wilderness Areas. BLM, Washington, DC.

18

19       . 2012f. Manual 6400, Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, Planning, and Management. BLM. Washington, DC.

20

21       . 2016a. Manual 1780, Tribal Relations. BLM, Washington, DC. December 15, 2016.

22

23       . 2016b. Handbook H-1781-I, Improving and Sustaining BLM-Tribal Relations. BLM, Washington, DC. December 15, 2016.

24

25       BLM GIS. 2014. Base GIS data on file with BLM's eGIS Server used for calculations or figures to support the MMP-A. BLM, Grand Staircase Escalante National Monument, Utah.

26

27       Forest Service (US Department of Agriculture, National Forest Service). 1986. Dixie National Forest Land and Resource Management Plan. Dixie National Forest, Cedar City, Utah.

28

29       NPS (US Department of the Interior, National Park Service). 1979. Proposed General Management Plan. July 1979, reprinted August 1991. Glen Canyon Recreation Area, Page, Arizona.

30

31       . 1987. Final Resource Management Plan, Cultural Component, Glen Canyon National Recreation Area. April 1987. Glen Canyon National Recreation Area. National Park Service – Rocky Mountain Region.

32

33       . 1999. Glen Canyon National Recreation Area Grazing Management Plan and Finding of No Significant Impact. NPS, Glen Canyon National Recreation Area, Page, Arizona. August 1999.

---

I. Introduction (References)

- I        \_\_\_\_\_. 2006. Management Policies. US Department of the Interior, National Park Service. ISBN 0-16-  
2                      076874-8.
- 3        \_\_\_\_\_. 2011a. Guidance for Non-Impairment Determination and the NPS NEPA Process. NPS,  
4                      Washington DC. October 31, 2011.
- 5        \_\_\_\_\_. 2011b. Director's Order #12: Conservation Planning, Environmental Impact Analysis, and  
6                      Decision-Making. NPS, Washington DC. Effective October 5, 2011.
- 7        \_\_\_\_\_. 2014. Foundation Document for Glen Canyon National Recreation Area and Rainbow Bridge  
8                      National Monument. National Park Service, Arizona and Utah. September 2014. Internet  
9                      website: [http://www.nps.gov/glca/learn/upload/GLCA-RABR\\_OV\\_SP.pdf](http://www.nps.gov/glca/learn/upload/GLCA-RABR_OV_SP.pdf).
- 10       \_\_\_\_\_. 2015. National Park Service NEPA Handbook. NPS, Washington DC. September 2015. Internet  
11                      website: [http://www.nps.gov/orgs/1812/upload/NPS\\_NEPAHandbook\\_Final.pdf](http://www.nps.gov/orgs/1812/upload/NPS_NEPAHandbook_Final.pdf).
- 12       Presidential Proclamation No. 6290. Establishment of Grand Staircase-Escalante National Monument.  
13                      September 18, 1996.
- 14       Toevs, G. R., J. J. Taylor, C. S. Spurrier, W. C. MacKinnon, and M. R. Bobo. 2011. Bureau of Land  
15                      Management Assessment, Inventory, and Monitoring Strategy: For integrated renewable  
16                      resources management. BLM, National Operations Center, Denver, Colorado.

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## Briefing Paper

### 1. State Office

Utah State Office.

### 2. What is the title of this notice?

Notice of Availability for a Draft Livestock Grazing Monument Management Plan Amendment and Associated Environmental Impact Statement (MMP-A/EIS) for the Grand Staircase-Escalante National Monument, Utah.

### 3. What are the key issues raised by the underlying decision documents for this notice?

Grand Staircase-Escalante National Monument (GSENM) has prepared a draft Environmental Impact Statement and Livestock Grazing Management Plan Amendment (MMP-A/EIS). It provides management direction for BLM lands in GSENM, as well as lands for which GSENM has administrative responsibility for livestock grazing, specifically portions of the BLM's Kanab and Arizona Strip Field Offices and National Park Service (NPS)-managed lands in Glen Canyon National Recreation Area (Glen Canyon).

The approved MMP-A/EIS would amend the 2000 GSENM Management Plan (MMP) to incorporate management of livestock grazing, and will supersede the existing Escalante, Paria, Vermillion, and Zion regional management framework plans (MFP) signed in 1981 and a subsequent plan amendment of the Escalante MFP completed in 1999, under which livestock grazing in GSENM is currently administered. Current land use plan decisions governing the management of livestock grazing in the GSENM provide an inadequate framework for future administration. The 2000 MMP established a grazing management process but did not make land use plan-level decisions for livestock grazing.

The MMP-A/EIS would make appropriate land use planning decisions, including establishing goals and objectives for livestock grazing and rangeland management. Establish broad-scale decisions that set the stage for site-specific implementation decisions, such as timing (season of use), duration (length of time), frequency of livestock grazing (how often), and magnitude (number of animal unit months (AUMs)) of livestock grazing. Identify where grazing uses are allowed, restricted, or prohibited (i.e., available or unavailable for livestock grazing). Identify grazing management practice and provide the land use plan level decisions needed to integrate livestock and rangeland management with the management of the GSENM objects and other resources.

This amendment could impact grazing permittees through temporary and permanent reduction of AUMs, loss of forage, potential restrictions on access and/or movement of livestock, and potential modification of range improvements.

The GSENM is under pressure from environmental groups to ensure current grazing practices are in conformance with the purposes for which the GSENM was established pursuant to the Presidential Proclamation 6920.

4. Who are the primary users affected by or parties interested in the underlying decisions or actions? What are their concerns?

The BLM's decision area for this planning effort is all of the BLM grazing lands that GSENM administers, including some lands in the BLM's Kanab Field Office (65,500 acres) and Arizona Strip Field Office (2,300 acres); the NPS - Glen Canyon (318,800 acres); along with 1,855,400 acres of GSENM. The total acres for the decision area include 2,242,000 acres. The planning area consists of 2,316,100 which include State and private lands.

GSENM manages 91 permits on 96 allotments; 79 active allotments are available for and managed for grazing; 17 allotments are wholly or partially unavailable. The people who have been granted grazing permits are strongly supported by local, county, and state government representatives who will be very sensitive to any reduction of AUMs. (b)(5) DPP



Environmental groups are also extremely interested in the management of GSENM: Wild Utah Project, The Wilderness Society, The Grand Canyon Trust, The Great Old Broads for Wilderness, and Western Watersheds Project, have established "Interested Party" status for many, and in some cases, all, of the GSENM's grazing allotments. A few of these environmental groups have also established monitoring plots on GSENM for comparison with GSENM range staff monitoring results. (b)(5) DPP



Conflicts between livestock and recreationist to GSENM are increasing and GSENM is receiving complaints about livestock use from recreational users.

Concerns include:

- Effects of livestock grazing management on GSENM proclamation-identified scientific and historical objects
- Effects of livestock grazing management on the resources and values for which Glen Canyon was established (e.g., public outdoor recreation use and enjoyment and scenic, scientific, and historical features)
- Lands available for livestock grazing in the decision area
- Forage currently available on an area-wide basis for livestock grazing and available for future anticipated demands
- Guidelines and criteria for future allotment-specific adjustments, such as the amount of forage available for livestock, season of use, or other grazing management practices
- Management of existing range improvement seedings and opportunities for future range improvements
- Effects of livestock grazing management on vegetation, including riparian vegetation
- Effects of livestock grazing management on soils, including biological soil crusts
- Effects of climate change and drought on forage availability
- Effects of livestock grazing management on local custom and culture
- Effects of livestock grazing management on the area's economy
- Effects of livestock grazing management on recreation
- Effects of livestock grazing on cultural resources

5. Is tribal consultation appropriate under E.O. 13175 or other authorities? Will the proposed action potentially impact tribes or tribal lands, or generate their interest? If so, what consultation or other communication/outreach are you planning?

GSENM invited local tribes, The Paiute Tribe of Utah and The Kaibab Band of Paiute Indians, to become a Cooperating Agency in May 2013. The Paiute Tribe of Utah formally declined, and the BLM received no response from the Kaibab Paiute Tribe. On October 25, 2013 and November 7, 2013, the BLM sent scoping letters to tribal governments providing initial notification of the MMP-A/EIS and information on the project. These letters were sent to six identified tribes with cultural ties to the decision area: Navajo Nation, San Juan Southern Paiute Tribe, Hopi Tribe, Pueblo of Zuni, Paiute Indian Tribe of Utah, and the Kaibab Paiute Tribe. The MMP-A/EIS will not directly impact tribal lands.

Further outreach and opportunities to comment on the draft MMP-A/EIS will be provided during general scoping and comment periods. Tribal concerns will be given due consideration.

6. Will this notice be controversial?

The notice will most likely be controversial; however, the BLM-Utah has done an extensive outreach effort. Coordination of the release of the Notice of Intent with state and local elected representatives, the Monument Advisory Committee, environmental groups, livestock permittees and interested stakeholders resulted in widespread support for moving ahead with the planning process.

This land use planning process has followed through on commitments at the state and local level to address issues and provide certainty for stakeholders by developing an MOU for Cooperating Agencies. On May 13, 2013 the BLM wrote to seven local, state, federal, and tribal representatives (mentioned above) to participate as cooperating agencies. Five agencies agreed to participate in the MMP-A/EIS process as designated cooperating agencies. Kane County, UT, Garfield County, UT, the State of Utah, and the USDA Natural Resources Conservation Service. The NPS is also a cooperating agency and has jurisdiction by law, and will be making its own separate decision for land within Glen Canyon based on this MMP-A/EIS. The US Fish and Wildlife Service did not respond.

7. What will the underlying decision or action change? (Summarize changes to policy, management practices, allowable uses, differences between draft and final, etc.)

Clear management direction is needed for livestock grazing within GSENM. Language found in the Monument's Proclamation related to grazing, the 1980's era Grazing Management Framework Plans and the current Monument Management Plan has led to confusion of livestock grazing administration. This has led to strong concerns by parties on both sides of the issue. The management direction resulting from this planning effort will clarify livestock grazing use on GSENM for all stakeholders. Permit renewals will continue to be processed under existing authorities until a plan amendment establishes an appropriate basis from which to tier permit renewal decisions.

(b)(5) DPP



(b)(5) DPP



The preferred alternative ((b)(5) DPP) consists of components (goals, objectives, and actions) of the other alternatives considered. During public review of this Draft MMP{ XE "Monument Management Plan, Grand Staircase-Escalante National Monument (MMP 2000)" }-A/EIS, the BLM is seeking constructive input on the proposals for managing resources and resource uses. After considering these comments, the BLM will develop a Proposed MMP-A to be evaluated in the Final EIS. The Proposed MMP-A/EIS can be any reasonable combination of objectives and actions from Alternatives A, B, C, D, and E presented in this Draft MMP-A/EIS.

8. Will this notice need communications materials, e.g., a press release, or a Communication Plan? If so, enclose these materials with the notice package submitted.

Yes, communication materials are included.

9. What are the reasons for the timing of the notice and the consequence, if any, of delaying or canceling the release?

The Utah State Director has made commitments to key stakeholders as to the timing for the release of the NOA in the summer of 2017.

10. How has this action been analyzed under the National Environmental Policy Act (NEPA)?

The NOI established a scoping period for the public and key stakeholders to take a part in the NEPA process to develop this MMP-A/EIS. What is currently available is the draft MMP-A/EIS and this notice to the Federal Register through a NOA will provide the public an opportunity to review and comment on the draft MMP-A/EIS.

11. Is there any additional pertinent, descriptive information that reviewers need to know or would increase understanding?

The National Riparian Service Team completed a Situational Assessment in 2012 and found “strongly differing philosophies present within the local community and among various regional and national interest groups. On the one hand, local ranchers and grazing interests feel severely threatened in terms of their economy, culture and customs as they face challenges to grazing on the Monument. On the other hand, environmental groups consider the GSENM, the largest and first National Monument managed by the BLM, as critical in charting a course of conservation and restoration of the nation’s “great places.”

On April 1, 2013, Utah’s Governor signed Utah HB382 establishing the Escalante Region Grazing Zone, encompassing all BLM and Forest Service land in Kane and Garfield Counties. This action amended the State of Utah Resource Management Plan for Federal Lands and established a State of Utah livestock grazing and rangeland management policy for the Grazing Zone which includes the entirety of GSENM.

12. List the names and positions of the people who have prepared, reviewed, and approved the notice and the underlying decisions and documents.

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